

COMMENTS IN THE MATTER OF: ET 03-104 Inquiry Regarding Carrier Current Systems,
including Power Line Broadband Systems

Submitted by:

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President
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Board of Commissioners
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Mr. Chairman and Commissioners,

I wish to express my strong opposition to the proposed use of the power line grid for distribution of broadband data, as proposed.

My objection is based on the following.

1. The proposed use of power line to distribute broadband data services is not consistent with the expressed, intended purpose of part 15. Part 15 radiators directly connected to the power grid will create millions of interference sources to licenced users of the radio spectrum between 4 and 80 MHz. Interferences sources in this volume will be impossible to identify, track and eliminate.

2. Licensees depend on signals in this spectrum for critical communications relating to public safety, emergency and military operations. Since the events of 9/11/2001 this high frequency spectrum has seen increased use for these purposes. The high levels of noise and interference resulting will require redesign of these critical systems at high cost to local state and federal governments.

3. The operation of power line broadband systems in Europe and Japan, has demonstrated the deleterious effects of such systems on high frequency communications circuits and operations.

4. The increased broadband competition anticipated in the enquiry can more easily be achieved by:

A. Changes in the marketing tactics of data service provider. For example, network providers should be required to sell access only, instead of bundling access with content. In addition, the same rules for "equal access" should apply to monopolies providing data access services, that apply to the telephone RBOC's.

B. Deregulation of satellite and terrestrial access providers to encourage development of local "access cooperative" in areas where investment in infrastructure is cost prohibitive.

Thank you.

